

National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



April 30, 2012

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees With Senior Institutional and Program Responsibilities to Attend 50 Years of Boeing in Alabama Celebration

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees, who have senior institutional and program responsibilities, have been invited to attend a reception celebrating 50 Years of Boeing in Alabama at the Davidson Center Space and Rocket Center in Huntsville on Wednesday, May 2, from 11:00 a.m. to 1:00 p.m.

This event will be a widely-attended gathering of community, business, and industry leaders, military officials, local and state elected officials, Chamber of Commerce members, aerospace and defense industry representatives, including Boeing's competitors, such as Dynetics, Teledyne, Northrop Grumman, and Raytheon, and Boeing employees and retirees. The food at the reception is valued at \$15 per person. Approximately 250 individuals are expected to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Boeing has numerous NASA contracts, including Space Launch System (SLS) work, and is a potential source for additional NASA procurements. The NASA employees listed presently, or may in the near future, have extensive involvement in matters relating to Boeing's business interests.¹ These personnel are similarly situated in that they each have senior institutional or program responsibilities for NASA that may involve Boeing's business interests with NASA.

I have determined that free attendance of these individuals at the reception is in the interest of the agency because it will further agency programs and operations. Their attendance at this event will help to raise NASA's profile with state and local business

¹ The employees invited are the NASA Associate Director; Marshall Center Director; Manager, SLS Program Office; Chief Engineer, SLS Program; Manager, SLS Stages Office; Manager, Science and Technology Office; Manager, Flight Programs and Partnerships Office; Deputy Program Manager, SLS Program Office; Supervisory Contract Specialist; Industry Relations Specialist; and Lead Public Affairs Specialist.

and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Accordingly, the listed employees may accept free attendance at the event. They may also accept free attendance for their spouse or a guest.

Additionally, Boeing is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$15 cost of the reception.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.


for Audrey D. Robinson
Chief Counsel